

M

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION

2018 MAY 11 AM 8:32

HANNAH RAQUEL NUSZEN,

Plaintiff,

v.

JACK NUSZEN; SHANNON ORAND
NUSZEN; NORMA WILLCOCKSON
a/k/a WILLCOXSON; MELVIN
WILLCOCKSON a/k/a
WILLCOXSON; DR. KAREN
GOLLAHER; SAGE EDUCATIONAL
GROUP; ASPEN INSTITUTE FOR
BEHAVIORAL ASSESSMENT; DR.
JEFFREY J. WILSON; DR. JOSHUA J.
CLUFF; DR. BRANDON S. PARK;
NEW HAVEN RESIDENTIAL
TREATMENT CENTER; DAYNA
BUXTON; JESSICA ENDRES; DAVE
ARCHER; JOHN and JANE DOES 1-
100,

Defendant(s).

CASE NO. 1:17-cv-05750


FILED

MAY 11 2018

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**PLAINTIFF'S MOTION TO REINSTATE
AND ADD DEFENDANT**

Plaintiff HANNAH RAQUEL NUSZEN hereby submits a Motion to Reinstate in accordance with Rule 4(m) of the Federal Rules of Civil Procedure and to Add Defendant in accordance with Rule 19 of the Federal Rules of Civil Procedure in this matter.

I. The Plaintiff Did Not Delay Process.

Fed.R.Civ.P. 4(m) states, "Unless the court orders otherwise, any required response to an amended pleading must be made within the time remaining to respond to the original pleading or within 14 days after service of the amended pleading, whichever is later."

This is a case where the Defendants JACK NUSZEN and SHANNON ORAND NUSZEN are guilty of child abduction under Tex. Penal Code S 25.03 (Interference of Custody) having paid Defendants NORMA WILLCOCKSON a/k/a WILLCOXSON and MELVIN WILLCOCKSON a/k/a WILLCOXSON to have me forcibly taken from school and transported across state lines, against my free will, and intentionally concealing my whereabouts over a long, extended period of time. The Defendants NORMA WILLCOCKSON a/k/a WILLCOXSON and MELVIN WILLCOCKSON a/k/a WILLCOXSON are guilty of child abduction under the Tex. Penal Code S 25.031 (a) (Agreement to Abduct From Custody).

These are serious and egregious offenses and the Defendants should not be permitted to profit and enjoy unjust enrichment from crimes that were perpetrated on me and the Court.

There has been problems getting some of the Defendants served as Hurricane Harvey had caused people to be displaced and there has been an issue with locating them to provide proper service. Additionally, the Defendants JACK NUSZEN and SHANNON ORAND NUSZEN, having been made aware of this action, have willfully and intentionally avoided service. Defendant JACK NUSZEN has finally been located while Defendant SHANNON ORAND NUSZEN continues to avoid service while seeking refuge in the State of Israel.

.II. Amended Complaint is Warranted.

Fed.R.Civ.P. 19 states that “a party is necessary to a lawsuit when one of two conditions arise: (1) the party must be present in order to award ‘complete relief’, or (2) the party has an interest in the action so that his or her interest cannot be represented and protected without that party appearing in the lawsuit. This also applies when the party's absence may expose other parties to double or inconsistent outcomes. gives the Court the authority to strike the responsive pleading if the response is not filed within the time required.”

Fed. R. Civ. P. 15(a) provides that leave to amend should “be freely given when justice so requires.”

The Complaint was filed and included Aspen Institute for Behavioral, however, it has since been learned that the facility has modified its name and it now calling itself Viewpoint Center. The fictitious names of John and Jane Does 1-100 were included as Defendants for just such a circumstance. Therefore, I respectfully request that the Viewpoint Center be added as a Defendant and to the caption heading in this matter.

III. Conclusion.

In short, Plaintiff did not willfully delay any part of the process. The natural disaster of Hurricane Harvey impeded the process server as did the Defendants who were notified about the Complaint who have willfully and purposefully avoided service. Further, an amended Complaint is justified in this matter as it was discovered that one of the Defendants modified their identity and the names of John and Jane Does 1-100 were included to ensure that the Plaintiff could add unidentified defendants at a future date.

In the interest of justice, I respectfully ask that this Honorable Court reinstate this case to active status.

Respectfully submitted,

Dated: May 7, 2018

/s/ Hannah Raquel Nuszen
HANNAH RAQUEL NUSZEN
5707 N. CHRISTIANA AVENUE
CHICAGO, ILLINOIS 60659
713-240-5059
Miriamb12969@gmail.com
PLAINTIFF, Pro se

CERTIFICATION OF SERVICE

I hereby certify that copies of this document for served upon the Parties at the addresses listed below via USPS certified mail, return receipt requested and email.

Norma Willcockson and Melvin Willcockson
Guardians of Hope
1915 North Frazier #104
Conroe, Texas 77301

Jack Nuszen and Shannon Orand Nuszen
c/o Golda R. Jacob, Esq.
440 Louisiana St #1500
Houston, TX 77002

Golda R. Jacob, Esq. and Golda R. Jacob and Associates
440 Louisiana St #1500
Houston, TX 77002

Dr. Karen Gollaher
9100 Southwest Fwy # 152
Houston, TX 77074

Sage Educational Group
3730 Kirby Dr #520
Houston, TX 77098

Viewpoint Center
2732 W 2700 S
Syracuse, UT 84075

Aspen Institute For Behavioral Assessment
2732 W 2700 S
Syracuse, UT 84075

Dr. Jeffrey Wilson
2732 W 2700 S
Syracuse, UT 84075

New Haven Residential Treatment Center
2172 East 7200 South
Spanish Fork, UT 84660

Dr. Bill Bunn
2172 East 7200 South
Spanish Fork, UT 84660

Dr. Lynda Baum
2172 East 7200 South
Spanish Fork, UT 84660

Dated: May 7, 2018

/s/ Hannah Raquel Nuszen
HANNAH RAQUEL NUSZEN
5707 N. CHRISTIANA AVENUE
CHICAGO, ILLINOIS 60659
713-240-5059
Miriamb12969@gmail.com
PLAINTIFF, Pro se